

## **EXHIBIT 1**

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1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MICHIGAN  
3 SOUTHERN DIVISION  
4 \_\_\_\_\_  
5 )  
6 ) Civil Action No.  
7 ) 5:16-cv-10444-JEL-MKM  
8 In re: FLINT WATER CASES ) (consolidated)  
9 )  
10 ) Hon. Judith E. Levy  
11 ) Mag. Mona K. Majzoub  
12 )  
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10 HIGHLY CONFIDENTIAL  
11 VIDEOTAPED DEPOSITION OF MICHAEL B. GLASGOW  
12 VOLUME I

14 Monday, February 24, 2020  
15 at 9:05 a.m.

17 Taken at: Butzel Long  
41000 Woodward Avenue  
18 Bloomfield Hills, Michigan 48304

22 REPORTED BY: CAROL A. KIRK, RMR/CSR-9139  
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1 A. Yes.

2 Q. What did you understand the Office  
3 of Drinking Water & Municipal Assistance to be?

4 A. Well, in a sense they kind of had  
5 a dual role as kind of a coach, but also kind of  
6 the police in my eyes. You know, they were  
7 there to guide us along but make sure we were  
8 doing things correctly.

9 Q. Okay. The title of the office was  
10 Office of Drinking Water & Municipal Assistance.  
11 It wasn't office of drinking water and  
12 manipulations and avoidance, was it?

13 MS. COLLINS: Objection; form.

14 A. No.

15 Q. Okay. Mr. Prysby was a  
16 professional engineer; was he not?

17 A. Correct.

18 Q. You were not?

19 A. Correct.

20 Q. And you are not today?

21 A. Correct.

22 Q. You've met Mr. Busch?

23 A. Yes, I have.

24 Q. He was a professional engineer,

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1 A. Yes.

2 Q. And that's something you would  
3 come to know over the course of your lifetime,  
4 that professional engineers have this duty and  
5 responsibility to the general public for safety,  
6 correct?

7 MS. COLLINS: Objection; form.

8 A. Yes.

9 Q. And I don't mean to diminish your  
10 knowledge and experience at all, Mr. Glasgow,  
11 but when it came to your communications with  
12 Prysby, Busch, Cook, and Shekter-Smith, the  
13 Office of Drinking Water & Municipal Assistance,  
14 they were the experts; were they not?

15 MS. COLLINS: Objection to form.

16 MR. KUHL: Object to form.

17 A. In my eyes, they were, yes.

18 Q. They were the people who knew or  
19 should have known what the rules of the game  
20 were?

21 MR. KUHL: Objection; form.

22 Q. Right?

23 A. Yes.

24 Q. They were the people that you and

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1 circumstances pertinent to the processes and  
2 equipment within the water treatment plant,  
3 correct?

4 A. Correct, yes.

5 Q. It was not evaluating the  
6 implications of utilizing the Flint River as a  
7 raw water source on Mr. Bincsik's distribution  
8 system, was it?

9 A. No.

10 Q. Okay. That 30-day test run, was  
11 that the longest test run that the water  
12 treatment plant was ever put to prior to April  
13 of 2014, to your knowledge?

14 A. Yeah. To my knowledge and my time  
15 there, that was the longest.

16 Q. You came to know LAN and Rowe; did  
17 you not?

18 A. Correct. Yes.

19 Q. And at LAN, the head guy, the lead  
20 engineer, was Warren Green?

21 A. Yes.

22 Q. You came to know Warren Green?

23 A. Absolutely, yep.

24 Q. You came to respect him as an

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1 engineer?

2 A. Yes.

3 Q. You came to trust his -- both his  
4 knowledge and his advice and opinions?

5 A. Yes.

6 Q. Mr. Green advocated vehemently for  
7 at least a 90-day run of the water treatment  
8 plant before it was put in full operation,  
9 didn't he?

10 A. Yes.

11 MS. COLLINS: Objection; form.

12 Q. Mr. Green advocated vehemently for  
13 the utilization of corrosion control treatment,  
14 and specifically orthophosphate, prior to  
15 implementation of the water treatment plant as a  
16 full-time facility?

17 MS. COLLINS: Objection to form.

18 (Reporter admonishment.)

19 MR. CAMPBELL: They don't like my  
20 form.

21 MR. KIM: Objection as to  
22 foundation.

23 BY MR. CAMPBELL:

24 Q. Do you have the question?

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1           A.     Yes, whether Warren Green was  
2     stipulating the addition of corrosion control.

3     And that, I do not remember.

4           Q.     Okay.  You're clear that Mr. Green  
5     wanted at least a 90-day operation of that plant  
6     before it was put into full-time operation,  
7     though?

8           A.     Yes, yes, because I was in  
9     agreement with him.  Yes.

10          Q.     Okay.  So you -- you were the only  
11     F-1 licensed operator at the plant, right?

12          A.     Correct.  Yes.

13          Q.     And while Mr. Wright may have been  
14     your titular supervisor, you really were the  
15     decision-maker at the plant at that time; isn't  
16     that so?

17                   MR. MARKER:  Objection; form,  
18     foundation.

19          A.     Yeah.  When it come to operation  
20     of the treatment plant, I would say yes.

21          Q.     Mr. Wright actually had to defer  
22     to you on those issues; did he not?

23          A.     Usually he would, yes.

24          Q.     So you, as the F-1 licensed

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1 operator, and Warren Green, the outside engineer  
2 hired to use his knowledge and advice and give  
3 advice, together you both wanted to run that  
4 plant for at least 90 days?

5 A. Yes.

6 Q. What happened?

7 A. Well, usually, number one -- and  
8 it's one of the things in some of my other  
9 testimony -- we were always a standby plant. We  
10 didn't have the staffing that we needed to.

11 I mean, to run that 30 day test  
12 run in July or August of '13 there, I basically  
13 had to institute all my employees to work  
14 16-hour days for 30 days.

15 Q. Okay.

16 A. So and after that, that was about  
17 all we could do, and, yes -- I stressed numerous  
18 times that we needed more staff and we needed  
19 them in there earlier if we were going to --

20 Q. To whom?

21 A. To my superiors, Mr. Johnson,  
22 Mr. Croft.

23 Q. What was their response?

24 A. "We're working on it. We're



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1 chemical feed systems, the condition of them?

2 A. Yeah, I know the chemical feed  
3 systems that were going into the clarifier and  
4 the softening process, they were -- they were  
5 not really functional. I remember running tubes  
6 along the floor. You know, we had some kind of  
7 halfway fabbed polymer lines running to the  
8 clarifiers when we first started.

9 Q. I know you didn't utilize soda  
10 ash, but did you have the capacity to use soda  
11 ash?

12 A. There was some old equipment  
13 around there that we used prior to the '70s I  
14 think when they softened and used water that  
15 were there. I had never seen them in operation  
16 in my time there.

17 Q. So you don't know whether they  
18 were functional?

19 A. I don't believe they were  
20 functional. I wouldn't have put any money on  
21 it.

22 Q. Was part of the flow bypassing the  
23 coagulation basins?

24 A. Yes, at times.

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1 Q. And why would that be so? What  
2 was the reason for that?

3 A. The reason for that is -- well, to  
4 be honest, my reasoning is I didn't really want  
5 to soften the water. It was a headache. And  
6 with my untrained staff, topped by such a  
7 dynamic process that changes was kind of a pain.

8 So we would bypass some of the  
9 softening just in the event something happened  
10 and we were still treating water and getting  
11 water out. But softening was mainly because I  
12 didn't want to soften the water.

13 Q. And you didn't want to soften  
14 water why?

15 A. For numerous reasons. But number  
16 one is my staff and the lime softening process  
17 and the way our plant was set up was not -- not  
18 ideal in my eyes. Softening to me -- softening  
19 the water is just an aesthetic. There's no  
20 regulations on that. And I thought it would be  
21 better for me and my staff if we didn't soften,  
22 because in our prior test runs, we didn't  
23 practice softening. And on top of that, we  
24 would send out hard water, which usually

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1           A.     I believe I told her to take that  
2     without, but it's kind of hard for me to  
3     remember now.

4           Q.     And then I think I mentioned to  
5     you before that later test results showed lead  
6     over 700 part per billion, and one taken by the  
7     EPA over 13,000 parts per billion.

8                     Do you remember that? Do you  
9     remember learning about that?

10          A.     Yes, I do.

11          Q.     Okay. So eventually in the summer  
12     when you're going to undertake monitoring,  
13     you're going to produce results of monitoring  
14     for lead and copper at the instruction of the  
15     DEQ, you were told by Mr. Busch and Mr. Prysby  
16     to remove the LeeAnne Walters' test results,  
17     weren't you?

18                     MS. COLLINS: Objection; form and  
19     foundation.

20          A.     Yes. The original one of 104,  
21     yes.

22          Q.     Okay. Did that kind of raise an  
23     eyebrow with you?

24          A.     A little bit, it did. But then,

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1 again, I did know in the Lead and Copper Rules  
2 that there's not supposed to be a point of use  
3 filter or any filter on the system.

4 Q. Well, that's what I'm getting to.  
5 I can envision a regulator saying, "Don't  
6 utilize test results for lead and copper on a  
7 system that has a filter, because the lead and  
8 copper results might be lower than you otherwise  
9 would get if there were no filter." Right?

10 A. Correct.

11 MS. COLLINS: Objection; form.

12 MR. KUHLE: Objection to form and  
13 foundation.

14 Q. Here you've got a filter in place  
15 and the lead results are way out of whack. Why  
16 would you not include that in your lead and  
17 copper test results or monitoring test results?

18 MR. KUHLE: Objection to form and  
19 foundation.

20 MR. MARKER: I'll join.

21 A. I included it with my report when  
22 I sent it.

23 Q. Yeah, but Prysby and Busch nixed  
24 it, right?

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1 it, is there?

2 MR. KUHLM: Objection to form and  
3 foundation.

4 Q. You ended up believing that to be  
5 so, correct?

6 A. Yes. Correct.

7 Q. There was a lot of discussion in  
8 the criminal court hearing about the Lead and  
9 Copper Rule forms that you filled out?

10 A. Yes.

11 Q. Sort of a two-, three-, or  
12 four-page form on the front -- on the first part  
13 of which you were asked a question and had to  
14 fill out a question as to whether or not all the  
15 sites were Tier 1 sites, and you answered no?

16 A. Correct. Yes.

17 Q. And then on the following pages,  
18 you identified addressees of where the lead and  
19 copper tests or sampling was done, and as to  
20 each, you identified the plumbing as -- or the  
21 service line as lead.

22 Do you remember that?

23 A. Yes. Yep.

24 Q. That had -- those responses had no

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1 basis in fact, correct?

2 MR. MARKER: Objection; form,  
3 foundation.

4 A. I did not have the information  
5 necessary to verify all that.

6 Q. And the whole point of that form  
7 was to provide verifiable information to the  
8 MDEQ, correct?

9 MR. MARKER: Objection; form,  
10 foundation.

11 A. I would say yes.

12 Q. Okay. I gather you assumed that  
13 the MDEQ, which was responsible for reviewing  
14 those forms, would see the contradiction in  
15 terms between page 1 and the back pages, right?

16 A. Correct. Yes.

17 Q. That was your assumption?

18 A. Correct. Yes.

19 Q. Was the first time that anybody  
20 from the MDEQ raised with you that contradiction  
21 in July of 2000- -- July 10th of 2015?

22 A. I believe that issue might have  
23 been raised earlier than that with Mr. Prysby.

24 Q. Give me a date.

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1           A.     I'm going to say somewhere around  
2     the LeeAnne Walters' time frame.

3           Q.     Whoa. Back in February and March  
4     of 2015?

5           A.     Yes.

6           Q.     Tell us -- I haven't seen those  
7     documents. Tell us about how that came about.

8           A.     Yeah, I'm trying to think. I  
9     think that was when I first notified -- or  
10    Mr. Prysby asked me a question in regards to our  
11    standard list of -- pulled list of samples for  
12    lead and copper monitoring, and asked me if  
13    Ms. Walters was on that.

14                   And I said no, but now after her  
15    results, that I was going to go look for the  
16    problem areas and take samples from there so I  
17    could really get an idea of what's going on.

18           Q.     How did that exchange lead you to  
19    believe that Prysby was aware of the  
20    contradiction between how you had filled out  
21    page 1 of the form and the ultimate -- and the  
22    follow-on pages. Explain that to us.

23           A.     I just think in the midst of  
24    conversation, I know I had reiterated to him the

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1 records, and the pulled list was not at my  
2 disposal. I had asked my supervisors for a list  
3 back in early '14, knowing that we had to do  
4 increased number of samples.

5 So I reiterated that to  
6 Mr. Johnson, Mr. Croft, and never received any  
7 list of pulled addresses.

8 So that's when I took it upon  
9 myself just to collect samples wherever we could  
10 get them. Mr. Bincsik assured me, you know,  
11 80 percent of the service lines are lead. So  
12 throw a dart, and you should be able to find  
13 your spots.

14 Q. It turns out that that's not so,  
15 though, right?

16 A. Yep. Absolutely.

17 Q. It turns out less than 30 percent  
18 of the service lines are lead in Flint, right?

19 MR. KIM: Objection as to form and  
20 foundation.

21 Q. You've learned that through the  
22 Fast program?

23 MR. KIM: Object to form and  
24 foundation.



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1           A.     Well, yeah. I've been off for a  
2 long time, so I've been not privy to all that  
3 info.

4           Q.     In any event, the data on Lead and  
5 Copper Rule reporting is unreliable, correct?

6           MR. MARKER: Objection; form and  
7 foundation.

8           MR. KUHLM: Objection; form and  
9 foundation.

10          A.     I'll have to say correct.

11          Q.     If you can't identify the source  
12 as a Tier 1 source, by definition that report is  
13 of no consequence, right?

14          MR. KUHLM: Objection to form.

15          MR. MARKER: I'll join.

16          A.     Correct.

17          Q.     What did Prysby do or say when you  
18 confronted him with the fact that the data was  
19 non-verifiable?

20          A.     It seems like he said, you know,  
21 he'd talk with Busch, and they would discuss  
22 this and get back with me.

23          Q.     Okay. Was it Busch and Prysby in  
24 the summer, in July of 2015, who decided that

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1 Q. Do you see that?

2 A. Uh-huh.

3 Q. And that was your understanding as  
4 of May of 2013, that the switchover would be a  
5 basis or a way for the city of Flint to save a  
6 lot of money, correct?

7 A. Correct, yes.

8 Q. And, again, I think you said  
9 before, you also thought it could have been  
10 leverage to try and get Detroit to lower their  
11 water prices so you could stay with Detroit  
12 water, correct?

13 A. Correct, yes.

14 Q. Did you have -- well, strike that.

15 After -- in May of 2013, did you  
16 have any understanding of what LAN's scope of  
17 work might be on the Flint water treatment  
18 plant?

19 A. No, I really can't say I did, to  
20 be honest with you. I knew they were going to  
21 be involved, but I never seen a statement of  
22 scope of work or anything like that.

23 Q. Did you have any understanding as  
24 to whether their work would be with regard to

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1 design and retrofitting the Flint water  
2 treatment plant as opposed to water treatment  
3 decisions or recommendations or  
4 responsibilities?

5 MR. MORRISSEY: Objection to form.

6 MR. KIM: Objection as to form and  
7 foundation.

8 A. From my personal, I guess,  
9 viewpoint, I would say it was more from a  
10 retrofit and upgrade capacity.

11 Q. Was it your understanding, just  
12 based on the ultimate project, that the city was  
13 going to maintain responsibility for water  
14 treatment decisions as far as the chemicals, the  
15 dosages, and how the water would be treated  
16 coming from the Flint River?

17 MR. KIM: Objection as to form.

18 MR. MORRISSEY: Objection to form.

19 A. I would have to answer that yes  
20 with, I guess, input from members of LAN and  
21 also the state and DEQ.

22 Q. We talked a little bit before  
23 about soda ash feed, and I think you testified  
24 before that before the Flint water treatment

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1 not be doing for the city of Flint on the Flint  
2 water treatment plant?

3 A. No --

4 MR. MARKER: Objection.

5 A. -- I was not.

6 Q. Were you involved in any meetings  
7 with Duffy Johnson to discuss what LAN would or  
8 would not be doing with regard to the project --  
9 the Flint water treatment project in 2013?

10 A. Not that I can recall, no.

11 Q. Were you engaged in any  
12 conversations or did you have any conversations  
13 with the MDEQ in 2013 about what LAN's scope of  
14 work would be?

15 A. No, I can't say that I did.

16 Q. And I think you said before that  
17 at least in your mind, LAN's scope of work was  
18 primarily related to retrofitting and design of  
19 the Flint water treatment plant, correct?

20 A. Correct.

21 MR. MORRISSEY: Object to form.

22 Q. And it was not necessarily with  
23 regard to decisions on water treatment, water  
24 quality, or dosages or chemicals that would be

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1 Q. Are you familiar with the term  
2 "primacy"?

3 A. Yes.

4 Q. And what does that mean to you?

5 A. Well, let me think how I would  
6 describe it. If they have -- whoever has  
7 primacy has, in effect, to me, the power to  
8 enforce some rules or dictate power and make  
9 decisions, I guess. That's kind of a broad  
10 definition, but they're the ones to enforce  
11 things.

12 Q. And did you understand that the  
13 DEQ was the primacy agent with regard to the  
14 water treatment decisions that related to the  
15 Flint water treatment plant?

16 A. Yes.

17 MR. KUHLE: Objection to form.

18 MR. SCHNATZ: Objection to form.

19 MS. COLLINS: Objection to form.

20 Q. I think you previously described  
21 in your testimony that the DEQ was kind of like  
22 a coach and a cop; is that fair enough?

23 A. Yeah, that's fair.

24 Q. What did that exactly mean?

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1           A.     Well, they're there to help you  
2     when you need it, but if you're not following  
3     the procedure, they're there to slap you on the  
4     hand if not.

5           Q.     Is it fair to say that the DEQ was  
6     your primary resource when you had questions  
7     about how to treat the water and the Flint water  
8     treatment plant when you went online in April of  
9     2014?

10          A.     Yes.

11          Q.     If you had disagreed with  
12     something that the DEQ had instructed you to do  
13     or not do, did you have any recourse or any  
14     ability to appeal that type of a decision?

15                   MS. COLLINS:  Objection; form.

16                   MR. MORRISSEY:  Object to form.

17          A.     Not to my knowledge.

18          Q.     You just testified previously that  
19     you always thought under the Lead and Copper  
20     Rule phosphates or some form of corrosion  
21     control would need to be included in the  
22     finished water treatment process, correct?

23          A.     Correct, yes.

24          Q.     And if you disagreed -- well,

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1           A.     No.

2           Q.     Do you have any understanding of  
3 specifically what the scope of work was that was  
4 set forth in the final change order number 2  
5 when LAN was retained to do work on the Flint  
6 water treatment plant?

7           A.     I do not.

8           Q.     I think you were asked this  
9 before, but do you have any recollection of any  
10 recommendations made by Warren Green -- well,  
11 strike that.

12                    You recall that Warren Green  
13 specifically made recommendations that there  
14 would need to be additional plant test runs on  
15 the Flint water treatment plant before water  
16 should be distributed from the Flint water  
17 treatment plant.

18                    You recall that?

19           A.     I do, yes.

20           Q.     And, in fact, do you recall when  
21 those recommendations were made?

22           A.     I can't really recall when they  
23 were made. I would -- it seems like they would  
24 be after our test run in July.

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1 Q. And the city never did a 60- to  
2 90-day plant test run, correct?

3 A. Correct.

4 Q. They never did any plant test run,  
5 prior to distributing water, where they  
6 evaluated the specific water characteristics and  
7 water quality coming from the plant before April  
8 of 2014 when the water went out?

9 MR. MARKER: Objection to form.

10 MR. KUHLE: Objection to form.

11 A. I can't say that I do, no.

12 Q. It would be important to do a  
13 60-to-90 plant test run to evaluate the water  
14 quality coming out of the plant before it was  
15 distributed to the public, correct?

16 A. Oh, absolutely, yes.

17 Q. It would be extremely important to  
18 understand how you were treating the water and  
19 whether it was presenting any type of danger to  
20 the public, correct?

21 A. Correct, yes.

22 Q. And despite those concerns, the  
23 city never did it, correct?

24 A. Correct.



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1 had a couple upgrades that pertained to the KWA  
2 water coming in that they would maybe be around  
3 with later on.

4 Q. So basically they weren't doing  
5 anything, based on your understanding, as to the  
6 operation of the plant with the Flint River  
7 water, but they were still working on upgrades  
8 for the KWA switchover, which was going to occur  
9 two years later; is that your understanding?

10 A. Correct, yeah.

11 Q. Do you recall ever having  
12 discussions with Warren Green about the water  
13 quality results and the monthly operating  
14 reports coming out of the Flint water treatment  
15 plant after April of 2014?

16 A. Not offhand, I do not.

17 Q. And LAN didn't have any role  
18 whatsoever in evaluating water quality and water  
19 treatment after April of 2014, correct?

20 MR. KIM: Objection as to form and  
21 foundation.

22 A. Not that I recall, no.

23 Q. Did you ever have any -- well,  
24 strike that.

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1           Q.     Okay. You described the  
2     relationship with the MDEQ and with their staff  
3     as being like a coach and like cops. Is that --  
4     was that accurate?

5           A.     Yes.

6           Q.     And you saw them as being coaches  
7     because they would provide advice, correct?

8           A.     Correct, yes.

9           Q.     Is there any other reasons why you  
10    saw them as coaches?

11          A.     Well, yeah, I guess I could say --  
12    when I think about it, I'm still laughing that I  
13    used that description of it, but, yeah, they  
14    would help, in my eyes, to interpret some of the  
15    rules from the Safe Drinking Water Act, you  
16    know. I don't know, probably everybody in this  
17    room has now seen the Safe Drinking Water Act.  
18    Now it looks like one of these big binders.

19                 But as with anything and, I guess,  
20    law like you guys practice, there could be  
21    different interpretations of items. So I would  
22    rely on them to help clarify things if I had  
23    questions.

24          Q.     Okay. And you also saw them to

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1 have a role as cops. Can you describe what you  
2 meant by that.

3 A. Yeah. In that aspect it makes me  
4 think of violations or if there's rules we're  
5 not following, that they've stipulated to us  
6 they can, you know, bring a little discipline  
7 down on us in a sense.

8 Q. Okay. Did you draw a distinction  
9 between those two roles in your view of the  
10 MDEQ, or were they occurring simultaneously?

11 MR. MARKER: Object to the form.

12 Q. Did you see that their role as --  
13 let me rephrase.

14 Did you see that their role as a  
15 coach was distinct and separate from their role  
16 as cops?

17 A. Not particularly. I would think  
18 it was almost a combination.

19 Q. Okay. So as a combination, did  
20 you feel that that -- that their suggestions  
21 carried great weight?

22 A. Yes, you could say that.

23 Q. Did you view that -- their  
24 suggestions as being optional?

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1           A.     No, not whatsoever. They -- well,  
2     when you're saying "suggestions," if something  
3     was brought across to me as a suggestion or  
4     recommended treatment practices, I took it -- I  
5     took it to heart, and I would try my best to  
6     institute it.

7           Q.     Okay. I'd like to address at  
8     least one more area here.

9                     In the fall of 2014, did you  
10    become aware of Legionella issues anywhere in  
11    the city of Flint?

12          A.     I did.

13          Q.     And where were those Legionella  
14    issues occurring?

15          A.     At McLaren Hospital in Flint.

16          Q.     Okay. How did you first become  
17    aware of those issues?

18          A.     I was contacted by Liz Murphy, who  
19    was, I think, an assistant to the emergency  
20    manager -- I wasn't sure of her title -- in  
21    regards to issues at McLaren Hospital, and  
22    McLaren was having a little meeting about it,  
23    and the city sent me to attend the meeting.

24          Q.     Okay. And who was at this

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1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MICHIGAN  
3 SOUTHERN DIVISION  
4 \_\_\_\_\_  
5 )  
6 ) Civil Action No.  
7 ) 5:16-cv-10444-JEL-MKM  
8 In re: FLINT WATER CASES ) (consolidated)  
9 )  
10 ) Hon. Judith E. Levy  
11 ) Mag. Mona K. Majzoub  
12 )  
13 \_\_\_\_\_

14 HIGHLY CONFIDENTIAL  
15 VIDEOTAPED DEPOSITION OF MICHAEL B. GLASGOW  
16 VOLUME III

17 Wednesday, February 26, 2020  
18 at 8:58 a.m.

19 Taken at: Butzel Long  
20 41000 Woodward Avenue  
21 Bloomfield Hills, Michigan 48304

22 REPORTED BY: CAROL A. KIRK, RMR/CSR-9139  
23 GOLKOW LITIGATION SERVICES  
24 877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com

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1           Q.     And if I recall correctly, you  
2     gave testimony that there was instruction from  
3     the MDEQ, specifically Mr. Prysby, who was the  
4     engineer assigned to the city of Flint, your  
5     engineer, that they were not going to be adding  
6     phosphates to the water; you were not required  
7     to add phosphates to the water; is that correct?

8           MR. MORRISSEY:   Objection to form.

9           MS. COLLINS:   Object to the form.

10          MR. KUHL:   Object to form; assumes  
11     testimony.

12          A.     That is correct.

13          Q.     What is your understanding of  
14     Mr. Prysby's role with respect to the city of  
15     Flint?

16          A.     He was our MDEQ district engineer  
17     assigned to oversee the city.

18          Q.     Thank you very much.

19                 With respect to the decision not  
20     to implement corrosion control treatment or add  
21     phosphates to the water, do you know the reason  
22     for that, as you sit here today?

23          A.     The reason is it was explained to  
24     me their interpretation of the Safe Drinking